

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JONATHAN N. WATERS)	
)	
Plaintiff,)	Case No. 14 CV 1704
)	
v.)	Judge James L. Graham
)	
THE OHIO STATE UNIVERSITY,)	Magistrate Judge Terence P. Kemp
)	
Defendant.)	

PLAINTIFF JONATHAN N. WATERS' DISCOVERY PLAN

Pursuant to the Court's Order of July 15, 2015, Plaintiff Jonathan N. Waters submits this discovery plan, which identifies the following additional discovery that he seeks to conduct prior to the September 15, 2015 deadline:

1. Deposition of President Michael Drake.

Mr. Waters plans to take the deposition of The Ohio State University ("OSU") President Dr. Michael Drake on August 20, 2015 at 10:00 a.m. Numerous issues have arisen with OSU's privilege log, which is 50 pages, consists of 425 entries, and withholds 2,239 pages of otherwise relevant documents. Mr. Waters' counsel may want to use some of these documents at President Drake's deposition. Until these issues are resolved, Mr. Waters requests that this deposition be delayed so that Mr. Waters' counsel can review and use those documents. Mr. Waters expects to take follow-up depositions depending on whom President Drake identifies as persons he consulted with or relied on regarding Mr. Waters' termination.

2. Deposition of Chris Glaros.

Mr. Waters plans to take the deposition of Chris Glaros, Assistant Vice President of Compliance Operations and Investigations for OSU's Office of University Compliance and

Integrity, on August 21, 2015 at 9:00 a.m. Numerous issues have arisen with OSU's privilege log, which is 50 pages, consists of 425 entries, and withholds 2,239 pages of otherwise relevant documents. Mr. Waters' counsel may want to use some of these documents at Mr. Glaros' deposition. Until these issues are resolved, Mr. Waters requests that this deposition be delayed so that Mr. Waters' counsel can review and use those documents. Mr. Waters expects to take follow-up depositions depending on whom Mr. Glaros identifies as persons who influenced his report.

3. Additional Discovery Requests.

Mr. Waters served a second set of discovery requests on July 17, 2015 and OSU's responses are due on August 17th. Depending on what is provided in OSU's discovery responses, Mr. Waters reserves the right to serve additional discovery requests.

Respectfully submitted,

/s/ David F. Axelrod

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 17, 2015, a copy of the foregoing was filed and served electronically through the Court's ECF system, which will effect service on all parties.

/s/ David F. Axelrod

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